

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUN 3 2011

U. S. DISTRICT COURT
E. DIST. OF MO.
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

STEPHEN E. VIERLING,

Defendant.

No. 4:11-cr-00238-RWS
4 11 CR 00238 RWS

INFORMATION

COUNT ONE

The United States Attorney charges that:

A. Introduction

1. At all times relevant to this information, Stephen E. Vierling was an employee and at times, the Chief Financial Officer for City Lighting Products Company, St. Louis, Missouri (hereafter "City Lighting"). This time period began approximately from 1991 through October 2007.

2. City Lighting was a family owned corporation incorporated under the laws of the State of Missouri.

3. City Lighting was engaged in the sale and distribution of lighting products, fixtures, and ballasts. Their customers were generally businesses and their sales were national in scope.

4. City Lighting's main office was in St. Louis, Missouri, Eastern District of Missouri, but had offices in Kansas City, Missouri, Denver, Colorado, and Pittsburgh, Pennsylvania.

5. Vierling's duties at City Lighting included the general management and entry of events on the books and records of City Lighting.

6. During the time of Vierling's employment at City Lighting, he embezzled money and property and stole from and otherwise defrauded his employer, City Lighting.

7. This embezzlement, theft, and fraud was accomplished by a number of methods including charging personal purchases on the City Lighting credit card assigned to him.

8. This was done without the knowledge of or approval of the owners of City Lighting, thus depriving them of money and property by this theft, embezzlement, and fraud.

9. Once these illegal and unauthorized credit card purchases were made, the credit card company would, and did, send monthly bills to City Lighting, St. Louis, Missouri to be paid.

10. These bills would then be paid under the authority of defendant Vierling including the personal purchases and use of the credit card without the approval of the owners of City Lighting.

11. These bills were then paid from the corporate headquarters of City Lighting, St. Louis, Missouri and mailed by U.S. mail to the address of the credit card company.

12. On or about August 25, 2006, in the City of St. Louis, Missouri, in the Eastern District of Missouri,

STEPHEN E. VIERLING,

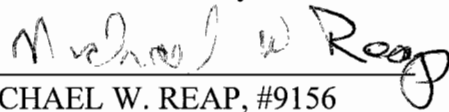
the defendant herein, having devised and intended to devise a scheme and artifice to defraud and

to obtain money or property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing such scheme and artifice and attempting to do so, did cause to be placed in the U.S. mail a City Lighting check in the amount of \$4,334.95, payable to Chase Card Services, P.O. Box 94014, Palatine, Illinois 60094-4014, said payment included personal purchases and uses of the credit card concealing such unauthorized use and thus obtaining money and property by the above scheme and artifice to defraud.

In violation of Title 18, United States Code, Sections 2 and 1341.

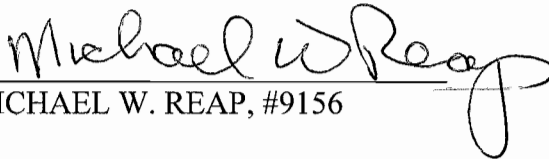
Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

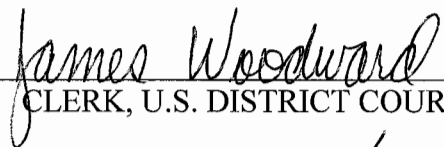

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UNITED STATES OF AMERICA)
EASTERN DIVISION)
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I, Michael W. Reap, Assistant United States Attorney for the Eastern District of Missouri,
being duly sworn, do say that the foregoing information is true as I verily believe.


MICHAEL W. REAP, #9156

Subscribed and sworn to before me this 2 day of May 2011.


CLERK, U.S. DISTRICT COURT

By: 
DEPUTY CLERK